

# EXHIBIT 34

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

		X
		:
FRANCIS FENWICK, EDWARD SAFRAN, STEVE	:	Civil Action No.:
HARDING, MARY WARDRETT, and LINDA YOUNG,	:	12-CV-07354-PGS-DEA
Individually and on behalf of all others similarly situated,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	<b>PRELIMINARY</b>
	:	<b>SUMMARY</b>
	:	<b>TRIAL PLAN</b>
RANBAXY PHARMACEUTICALS, INC., RANBAXY	:	
LABORATORIES, LTD., RANBAXY LABORATORIES,	:	
INC., RANBAXY, INC., RANBAXY USA, OHM	:	
LABORATORIES, ABC CORPORATIONS 1-10, and	:	
JOHN DOES 1-10,	:	
	:	
Defendants.	:	
		X

The trial will address common factual questions and common legal questions affecting the class or subclasses that are certified by the Court. Two preliminary charts of common factual questions and common legal questions are attached. (Entitled Exhibit 27 and 28)

The trial will address liability issues first, including those listed in Exhibit 27 and Exhibit 28. The causes of action to be charged will be breach of implied warranty of merchantability, breach of express warranty, and unjust enrichment.

The trial will also address damages issue, including the amount of damages to be awarded to the class members. Evidence will be presented concerning the out of pocket damages for each class member, the total amount paid for the pills in question (i.e., the market value), and industry values.

There will be evidentiary issues to be addressed including the defendants' withholding of documents and the appropriate punitive measures.

The witnesses will include the class representatives, Ranbaxy witnesses, FDA witnesses, and experts.

If a nationwide class is certified applying New Jersey law, the appropriate jury instructions will be given pursuant to that law. If the Court certifies classes for the different causes of action applying the laws of different states that have been grouped together based on similarities, the jury charges will be prepared at the time of trial to cover the particular groupings that the Court has ordered.

We anticipate rulings being necessary on the admissibility of numerous documents concerning Ranbaxy's quality control problems, FDA problems, fines, etc. and related issues. Any alleged prejudicial effect of such evidence will be outweighed by the probative value of the evidence.

Dated: May 25, 2018

*s/Barry J. Gainey*

Barry J. Gainey (7560)

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